

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS (LULAC), et al.,

Plaintiffs,

v.

GREG ABBOTT et al.,

Defendants.

Civil Action No. 3:21-cv-00259

(Lead Case)

FAIR MAPS TEXAS ACTION COMMITTEE,
et al.,

Plaintiffs,

v.

GREG ABBOTT et al.,

Defendants.

Civil Action No. 3:21-cv-01038

(Consolidated case)

FAIR MAPS PLAINTIFFS' NOTICE OF DESIGNATION OF REBUTTAL EXPERTS

Pursuant to the Court's June 9, 2022 Modifying Scheduling Order, ECF No. 325, Plaintiffs Fair Maps Texas Action Committee, OCA-Greater Houston, Emgage, Khanay Turner, Angela Rainey, Austin Ruiz, Aya Eneli, Sofia Sheikh, Niloufar Hafizi, Lakshmi Ramakrishnan, Amatullah Contractor, Deborah Chen, Arthur Resa, Sumita Ghosh, Anand Krishnaswamy, Peter Johnson, Zahra Syed, Chandrashekar Benakatti, Dona Murphey, Chetan Reddy, Sankar Muthukrishnan, Christina Lu, Jason Zhang, Chris Leal, Ashley Washington, and Sarika Maheshwari (collectively, "Fair Maps Plaintiffs"), through their undersigned counsel, hereby designate the following rebuttal experts in this case:

I. Retained Rebuttal Expert Witnesses

1. Loren Collingwood, PhD.
Associate Professor of Political Science at the University of New Mexico
1 University of New Mexico
Albuquerque, NM 87131
lcollingwood@unm.edu
Dr. Collingwood will testify regarding his rebuttal report and materials served under separate cover on July 27, 2022.
2. Doug Spencer, PhD.
Associate Professor of Law at the University of Colorado, Boulder.
Wolf Law Building, 401 UCB
2450 Kitteredge Loop Road
Boulder, CO 80309
douglas.spencer@colorado.edu
Dr. Spencer will testify regarding his rebuttal report served under separate cover on July 27, 2022.
3. Anthony “Tony” Fairfax
CEO & Principal Consultant, CensusChannel LLC
16 Castle Haven Road
Hampton, VA 23666
fairfax@censuschannel.com
Mr. Fairfax will testify regarding his rebuttal report to be served under separate cover at a later date agreed to by the parties.

II. Non-Retained Rebuttal Expert Witnesses

Fair Maps Plaintiffs specifically give notice that they intend to rely on the expert testimony of other Plaintiffs groups, which includes rebuttal experts. To streamline trial presentation and not present overly duplicative testimony, Fair Maps Plaintiffs will rely on rebuttal expert opinions given by other Plaintiffs and their counsel. The designation of experts, rebuttal experts, corresponding reports, and expert disclosures served by other Plaintiffs are incorporated herein for all purposes. Fair Maps Plaintiffs make this designation without conceding the qualifications, reliability, relevancy, or admissibility of such witness’ opinions.

Date: July 27, 2022

Respectfully submitted,

/s/ Noor Taj

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**Admitted pro hac vice*

ATTORNEYS FOR FAIR MAPS PLAINTIFFS

CERTIFICATE OF SERVICE

I certify that on July 27, 2022, the foregoing Notice of Designation of Rebuttal Experts was sent by email to Counsel of record for Plaintiffs, Defendants, and Plaintiffs-Intervenors.

/s/ Noor Taj
Noor Taj